

**UNITED STATES OF AMERICA**  
**BEFORE THE NATIONAL LABOR RELATIONS BOARD**  
**REGION 20**

STEVENS CREEK CHRYSLER, JEEP DODGE,  
INC.

Respondent / Employer

Cases Nos.:

and

MACHINISTS DISTRICT LODGE 190,  
MACHINISTS AUTOMOTIVE LOCAL 1101,  
INTERNATIONAL ASSOCIATION OF  
MACHINISTS AND AEROSPACE WORKERS  
OF AMERICA, AFL-CIO

20-CA-33367  
20-CA-33562  
20-CA-33603  
20-CA-33655

Charging Party

**RESPONDENT'S OPPOSITION TO REQUEST FOR EXTENSION OF  
TIME TO FILE EXCEPTIONS AND SUPPORTING BRIEF**

Respondent hereby submits its opposition to General Counsel's request pursuant to Section 102.46 (a) of the Board's Rules and Regulations for a two-week extension of time to submit exceptions and supporting brief to the decision of the Administrative Law Judge (ALJ) in the above referenced matter and in support thereof states as follows:

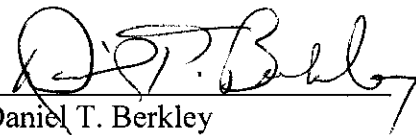
1. The record in this matter by necessity has presumably been reviewed and analyzed in preparation of the brief to the Administrative Law Judge. Further review of the record as offered by General Counsel is hardly a legitimate factor in support of the request for extension.
2. General Counsel had a team of two counsel at the hearing and working on this matter from the inception, making the vague conflicting work related commitments inadequate as legitimate factors in support of the request for extension.

3. On July 3, 2008, several days before General Counsel purportedly received the decision of the Administrative Law Judge, employees of Respondent were openly discussing the fact that the decision had already been received. Accordingly, failing to receive the decision is not attributable to the ALJ, nor does it support the request for extension.
4. Respondent strongly objects to the filing of any sort or manner of exceptions in this matter due to the ongoing unnecessary, oppressive litigation and investigative pressures and costs resulting from the actions of the General Counsel on matters which now ought to be considered resolved as decided by the Administrative Law Judge, said decision having been essentially outlined by the ALJ at the conclusion of the General Counsel's case in chief. Moreover, Respondent objects to the unnecessary expenses and costs incurred by the General Counsel as needless expenditure of public funds.

WHEREFORE, Respondent respectfully requests that General Counsel's motion for an extension until August 12, 2008 to file exceptions and supporting brief be denied. A copy of this request is being served on General Counsel and Charging Party.

Dated: July 23, 2008

Respectfully submitted,



Daniel T. Berkley  
Gordon & Rees LLP  
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San Francisco, CA 94111  
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Fax: (415) 986-8054  
Counsel for Respondent Stevens  
Creek Chrysler Jeep Dodge, Inc.

### CERTIFICATE OF SERVICE

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is: Gordon & Rees LLP 275 Battery Street, Suite 2000, San Francisco, CA 94111. On July 23, 2008, I served the within documents:

➤ **OPPOSITION TO REQUEST FOR EXTENSION OF TIME TO FILE  
EXCEPTIONS AND SUPPORTING BRIEF**

- ☒ by transmitting via facsimile, with their permission, the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.
- ☐ by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.
- ☐ by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in United States mail in the State of California at San Francisco, addressed as set forth below.


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I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on July 23, 2008 at San Francisco, California.

  
\_\_\_\_\_  
Bob Lieberman

# FACSIMILE TRANSMISSION

GORDON & REES LLP

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**DATE:** July 23, 2008

**To:**

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Joseph Norelli	NLRB Region 20	(415) 356-5156	(415) 356-5130
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**FROM:** Bob Lieberman

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## FACSIMILE TRANSMISSION

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